

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ROWLAND MARCUS ANDRADE and)	
ABTC CORP.,)	
)	
<i>Movants,</i>)	
)	
vs.)	Case No. 4:24-MC-00248
)	
UNITED STATES OF DEPARTMENT OF)	
THE TREASURY, INTERNAL REVENUE)	
SERVICE,)	
)	
<i>Respondent,</i>)	
_____)	

**RESPONSE OF NON-OPPOSITION TO THE MOVANTS'
MOTION FOR A MODIFIED STAY (DKT. NO. 59)**

Upon further consideration, including discussion with the Government's client the Internal Revenue Service, the Government is not opposed to this Court extending its stay order (Dkt. No. 58) until the U.S. Court of Appeals for the Fifth Circuit decides the Movants' appeal in Fifth Circuit Case No. 24-20376, or until a date this Court deems appropriate. However, in consenting to this extension of the stay, the Government does not concede the Movants have established they are entitled to it.

Dated: October 21, 2024,

Respectfully submitted,

DAVID A. HUBBERT

Assistant Attorney General
Department of Justice, Tax Division
/s/ Eduardo R. Mendoza
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Certificate of Service

I certify that on October 21, 2024, I electronically filed this document on the Court's CM/ECF system, which will automatically service a Notice of Electronic Filing on all attorneys of record.

/s/ Eduardo R. Mendoza
Eduardo R. Mendoza